

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO, *ex rel.*  
State Engineer

Plaintiff,

vs.

RAMON ARAGON, *et al.*,

Defendants.

69cv07941 BB-ACE

RIO CHAMA STREAM SYSTEM  
Section 3: Rio Cebolla

**Subfile No. CHCB-003-0015B**

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

COMES NOW the Plaintiff State of New Mexico, *ex rel.* State Engineer (“State”) and moves the Court to grant an extension of time to reply to the response of Defendants David and Lydia Archuleta to the State’s Motion for Summary Judgement filed October 27, 2004 (Doc. No. 7625), and as grounds states as follows:

1. Stacey J. Goodwin, counsel for the State in this disputed subfile matter, has experienced a death in her family. As soon as possible, she plans to leave the State of New Mexico for several days. The State’s reply is due by Monday December 13, 2004, and her work on this brief is presently incomplete. Counsel for the Defendants, Ernest L. Padilla, has agreed to a one week extension of time, until December 20, 2004, for the State to complete and file its reply.

WHEREFORE the State of New Mexico respectfully requests that the Court enter its order granting an extension of time until December 20, 2004, for the State to file its reply to the Defendants’ response to the State’s Motion for Summary Judgement filed October 27, 2004.

Respectfully submitted,

/s/ Ed Newville

EDWARD G. NEWVILLE  
Special Assistant Attorney General  
Office of State Engineer  
P.O. Box 25102  
Santa Fe, NM 87504-5102  
(505) 827-6150

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the above Unopposed Motion for Extension of Time was mailed to the following persons on December 9, 2004.

/s/ Ed Newville

Edward G. Newville

### **RIO CHAMA SECTION 3 SERVICE LIST**

Special Master Vickie L. Gabin USDC-DCNM P.O. Box 2384 Santa Fe, NM 87504-2384	NM Acequia Association 607 Cerrillos Road, Suite F Santa Fe, NM 87505
Karla McCall, Data Manager. 1315 Sagebrush Dr. SW Los Lunas, NM 87031	Ted J. Trujillo, Esq. P.O. Box 2185 Española, NM 87532-2185
Bradley S. Bridgewater, Esq. David W. Gehlert, Esq. USDOJ-ENRD 999 18th St., Suite 945 Denver, CO 80202	NM Acequia Commission Fred Vigil, Chairman Depart. of Finance & Admin. Local Government Division Bataan Memorial Building Santa Fe, NM 87503
John W. Utton, Esq. Sheehan, Sheehan & Stelzner PA P.O. Box 271 Albuquerque, NM 87103-0271	Ernest L. Padilla, Esq. Padilla Law Firm, P.A. P.O. Box 2523 Santa Fe, NM 87504-2523
Fred J. Waltz, Esq. P.O. Box 6390 Taos, NM 87571-4010	
Paula Garcia	